IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE CHATTANOOGA DIVISION

ROGER MUNSON and wife,)	
EDITH MUNSON,)	
Plaintiffs,)	
v.)	NO JURY DEMAND
WALMART, INC., FKA WAL-MART)	JUNI DEMIAND
STORES, INC. and WAL-MART REAL)	
ESTATE BUSINESS TRUST,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendant Wal-Mart Stores East, L.P.¹ (incorrectly sued as Walmart, Inc., FKA Wal-Mart Stores, Inc. and Wal-Mart Real Estate Business Trust) hereby gives Notice of the removal pursuant to 28 U.S.C. § 1441 et. seq., of the following action filed against it:Roger Munson and wife, Edith Munson v. Walmart, Inc., FKA Wal-Mart Stores, Inc. and Wal-Mart Real Estate Business Trust; In the Circuit Court of Bradley County, Tennessee; No. V-22-600. Copies of the summons and complaint are attached as Exhibits A and B, respectively. Plaintiffs are citizens and residents of Bradley County, Tennessee. Defendant Wal-Mart Stores East, L.P. is a Delaware limited partnership with its principal place of business in Bentonville, Arkansas. The general partner is WSE Management, LLC, a Delaware limited liability company. The limited

¹Wal-Mart Stores East, L.P. owns and operates the subject premises known as Wal-Mart located at 2300 Treasury Drive, S.E., Cleveland, Tennessee 37323. Therefore, Wal-Mart Stores East, L.P. should be substituted in the place of Walmart, Inc., FKA Wal-Mart Stores, Inc. and Wal-Mart Real Estate Business Trust as the proper named defendant.

partner is WSE Investment, LLC, a Delaware limited liability company. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores, East, LLC fka Wal-Mart Stores East, Inc., and Arkansas limited liability company. The sole member of Wal-Mart Stores, East, LLC is Walmart Inc. fka Wal-Mart Stores, Inc., a Delaware corporation. The principle place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states. Plaintiffs seek \$275,000 in damages, which is in excess of the federal jurisdictional requisite.

Plaintiffs' complaint was filed on September 28, 2022. Wal-Mart was served on October 3, 2022. It has been less than thirty (30) days since Wal-Mart was served the summons and complaint. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b). On October 6, 2022, plaintiffs filed an amended complaint in the Circuit Court for Bradley County, Tennessee. Plaintiffs' amended complaint is attached hereto as Exhibit C.

WHEREFORE, Wal-Mart hereby gives Notice of the removal of this action pending in the Circuit Court for Bradley County, Tennessee, to the United States District Court for the Eastern District of Tennessee, Chattanooga Division, and requests that the proceedings be held thereon.

²Wal-Mart Stores East, Inc. was converted to an Arkansas limited liability company on January 25, 2011.

s/ Greg Callaway

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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via U.S. Mail upon Robert G. Norred, Jr., Logan-Thompson, P.C., P.O. Box 191, Cleveland, TN 37364-0191; on this 28th day of October, 2022.

s/ Greg Callaway

 $W{:}\backslash GWC\backslash Munson.Roger\backslash Notice\ of\ Removal.wpd$